



916 S. Riverside Ave
St. Clair, MI 48079
810-326-2822 (phone)
810-329-6560 (fax)
janice_richards@cargill.com

August 5, 2003

Mr. Chris Ethridge
MDEQ – Air Quality Division
SE Michigan District Office
38980 Seven Mile Road
Livonia, Michigan 48152

Subject: Request for Compliance Program
Cargill Salt, St. Clair, MI- SRN# A6240

Dear Mr. Ethridge:

This letter is in response to the Michigan Department of Environmental Quality's (MDEQ) request that Cargill "submit a compliance program outlining what additional steps the company will take to resolve the cited violation and to prevent future fallout dust problems from occurring".

While we continue to question the appropriateness of the conclusion that we are causing a Rule 901 violation based on the evidence you cited, we do not question that there are improvements that we can make to reduce particulate emissions from our coal fired boiler, and thus reduce whatever impact those emission have in our community.

Cargill specifically commits to complete the following by December 31, 2003:

- ❖ Replace the multiclone tubes and the dirty side tube sheet in one half of the mechanical dust collector. As mentioned in our July 14, 2003 letter, the mechanical collector has experienced wear over time and we recently replaced all the tubes and the dirty side tube sheet in one-half of the collector. Only one-half was completed at a time due to the long lead-time of getting tubes and the extensive down time required to perform the work. The long lead-time for getting tubes is due to the fact that these tubes must be custom cast.

If you have any additional questions, please do not hesitate to contact me.

Sincerely,

Janice Richards
Environmental Coordinator

cc: Gene Chauffe
Don Chutas
Wade Richards
Dan Taylor

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U.S. EPA, REGION 5

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U.S. EPA, REGION 5

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AIR QUALITY DIV.
SEMI OFFICE

November 17, 2003

Mr. Chris Ethridge
MDEQ – Air Quality Division
SE Michigan District Office
38980 Seven Mile Road
Livonia, Michigan 48152

Subject: Compliance Program – Timeline Update
Cargill Salt, St. Clair, MI – SRN: A6240

Dear Mr. Ethridge:

As discussed during our phone conversation on November 17, 2003, Cargill will not have the parts available to rebuild the second half of the mechanical collector by December 31, 2003 as previously agreed upon.

The multiclone tubes were originally scheduled to arrive at the facility on October 10, 2003 but as of the date of this letter we still have not received them and our supplier has not yet received them from overseas. The most recent best estimate of when we will receive them is mid-December. Unfortunately this is past the scheduled shutdown of December 1, 2003 and a shutdown immediately after the current estimated receipt date will conflict with the Christmas Holiday. This puts us into the coldest part of the year when a shutdown of the wet plant is not possible due to freezing conditions

The next possible time period to shut the plant down is late March 2004, when temperatures increase enough to allow a shutdown. Therefore we request to modify the compliance plan submitted September 22, 2003 to reflect a completion date of March 31, 2004

If you have any questions or concerns with the extended timeline please contact me.

Sincerely,

Daniel Taylor
Environmental Manager

cc: Don Chutas
Wade Richards



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A6240

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U.S. EPA, REGION 5

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AIR QUALITY DIV.
SEMI OFFICE

November 17, 2003

Mr. Chris Ethridge
MDEQ – Air Quality Division
SE Michigan District Office
38980 Seven Mile Road
Livonia, Michigan 48152

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If you have any questions or concerns with the extended timeline please contact me.

Sincerely,

Daniel Taylor
Environmental Manager

cc: Don Chutas
Wade Richards

CJE
A6240
manila

CERTIFIED MAIL 7000 1670 0013 0981 8159



916 S. Riverside Ave
St. Clair, MI 48079
810-326-2841 (phone)
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wade_richards@cargill.com

September 22, 2003

Mr. Chris Ethridge
MDEQ – Air Quality Division
SE Michigan District Office
38980 Seven Mile Road
Livonia, Michigan 48152

Subject: Request for Compliance Program – Additional Information
Cargill Salt, St. Clair, MI – SRN: A6240

Dear Mr. Ethridge:

This letter is in response to the Michigan Department of Environmental Quality's (MDEQ) correspondence dated September 2, 2003, that requests details of the compliance plan Cargill submitted on August 5, 2003.

In your letter dated September 2, 2003, it states that, "several federal and state air pollution regulatory staff have observed heavy opacity exiting Cargill Salt's coal-fired boiler stack in the past few months." Specifically the MDEQ requested opacity data for July 9, 2003. It should be noted that no opacity violations occurred during the day in question and you affirmed this with Janice Richards during a September 15, 2003 phone conversation.

While we continue to question the appropriateness of the conclusion that we are causing a Rule 901 violation based on the evidence you cited, we continue to improve our boiler and associated air pollution control as we do with all our operating assets.

A detailed description of the Mechanical Collector upgrade, previously committed to in our letter dated August 5, 2003 follows:

- ❖ Replace the multiclone tubes and the dirty side tube sheet in one half of the mechanical dust collector. As mentioned in our July 14, 2003 letter, the mechanical collector has experienced wear over time and we recently replaced all the tubes and the dirty side tube sheet in one-half of the collector. Only one-half was completed at a time due to the long lead-time of getting tubes and the extensive down time required to perform the work. The long lead-time for getting tubes is due to the fact that these tubes must be custom cast. The shutdown is currently scheduled for November 3, 2003. The actual shutdown date is subject to change based on customer inventories, parts, resource availability and other factors. We will complete the following as stated prior end of 2003 fiscal year.
 - 10/01/03 - 80 cast inlet tubes and cast conical boots manufactured in the foundry.

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- 10/10/03 - Cargill receives cast inlet tubes, conical boots and gaskets.
 - 10/13/03 - Install gaskets, grind down burrs, and prepare all cast pieces. Assemble outlet tubes, inlet vanes and outlet vanes. The manufacturer's recommendation was to tack weld the inlet vane to the outlet tubes. We have found that this allows short-circuiting of airflow and accelerates the deterioration of the tube. We assembled the East half of the collector with continuous welded inlet vanes to the outlet tube.
 - Day one of shutdown - We will hose down the mechanical collector to cool it and wash down any dust. We will remove the existing 80 inlet tubes. This takes approximately 16 hours for 4 people.
 - Day two - 5 - We will remove the existing dirty side tube sheet on the West side of the collector. The support structure will also be removed at this time. This will require removing insulation, cutting holes in the boiler housing, and cutting tube sheet into small pieces to remove through holes. We will cut out all 80 of the outlet tubes and prepare the holes to weld in the 80 new outlet tubes. We will install the new dirty side tube sheet and tack weld in place so it is ready to install outlet tubes.
 - Day 5 - 8 - We will install the 80 inlet tubes. This requires two people inside to support and install the four nuts on the studs to hold the tube in place. The outlet tubes will be placed inside the inlet tube so they can be welded into place.
 - Day 8 - 12 - We will weld out the dirty side tube sheet. This will prevent short-circuiting of flue gas from the inlet to dirty side. We will reinstall the support structure for the tube sheet. We will weld all 80-outlet tubes to the clean side tube sheet. This will separate the inlet air from the clean side.
 - Day 13 - Cargill will bring the boiler on line assuming this task, along with numerous others scheduled are completed.
- ❖ Cargill will also perform our Annual inspection on the mechanical collector per our Malfunction Abatement Plan during this outage.
 - ❖ Cargill will also perform our Annual inspection on the #5 boiler baghouse per our Malfunction Abatement Plan during this outage.

If you have any additional questions, please do not hesitate to contact me.

Sincerely,



Wade Richards
Powerhouse Superintendent

cc: Gene Chauffe
Don Chutas
Wade Richards
Dan Taylor
Gary Rimmey, Salt / 21



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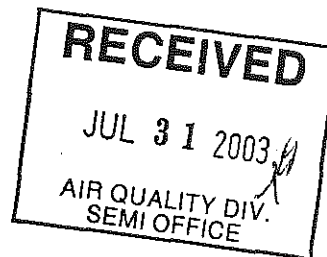
AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

CJE

change
AL240

July 30, 2003

Ms. Teresa Seidel
District Supervisor
MDEQ Air Quality Division
SE Michigan District Headquarters
38980 Seven Mile Road
Livonia, Michigan 48152-1006



Subject: Semi-annual NSPS OOO Report for the Period
January 1, 2003 – June 1, 2003

Dear Ms. Seidel:

This report is being submitted in accordance with the semi-annual reporting requirements required by NSPS Subpart OOO (40 CFR 60.676(d)). To satisfy these requirements, Cargill Salt – St. Clair, takes daily readings of the pressure drop and liquid flow rate of the pollution control devices subject to the Subpart.

Please find below a summary of occurrences when Cargill's wet scrubbers, subject to the subpart, differed by +/- 30% from the average readings taken during the initial performance test.

EGPACKAGING – EP006

The initial performance test for this source was conducted on November 9th – 11th, 1999. The follow is a summary of average readings recorded during the performance test and the corresponding 30% range.

	<u>Water Flow, gpm</u>	<u>Pressure Drop, inches</u>
Average Reading	47.4	1.8
+/- 30% Range	33.2 – 61.6	1.2 – 2.4

EP006 was within the specified range throughout this reporting period.

EGSCREENING - EP007

The initial performance test for this source was conducted on May 24th, 2001.
The follow is a summary of average readings recorded during the performance test and the corresponding 30% range.

	<u>Water Flow, gpm</u>	<u>Pressure Drop, inches</u>
Average Reading	51.3	6.8
+ / - 30% Range	35.9 - 66.7	4.7 - 8.9

EP007 was within the specified range throughout this reporting period.

EGPRETZEL - EP031

The initial performance test for this source was conducted on May 16th, 2000.
The follow is a summary of averages readings recorded during the performance test and the applicable 30% range.

	<u>Water Flow, gpm</u>	<u>Pressure Drop, inches</u>
Average Reading	51.3	6.0
+ / - 30% Range	35.9 - 66.7	4.2 - 7.8

EP031 was within the specified range throughout this reporting period.

If you have any questions regarding this matter, please call me at 810-326-2822.

Sincerely,



Janice Richards
Environmental Coordinator



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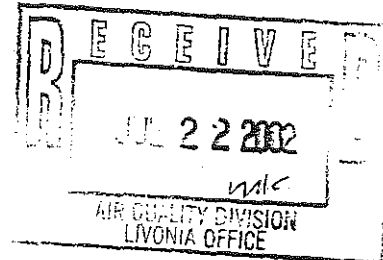
MAR 22 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

AL6240
Blue
NSPS testing

July 16, 2002

Mr. Chris Ethridge
Environmental Quality Analyst
MDEQ - SE District
389807 Mile Road
Livonia, MI 48152



Re: July 9 and July 16, 2002 Method 22 Test, Building 5

Dear Mr. Ethridge:

Please find attached observation logs for the Method 22 tests conducted on July 9, 2002 and July 16, 2002. The tests were conducted by Jim Voss, Chris Ethridge and Dan Taylor.

The purpose of the test was to demonstrate compliance with NSPS OOO and Permit No. 83-00. The subject equipment is NSPS OOO regulated equipment located in Building 5 that is not hooked up to dust collection. Method 22 was chosen as the best method to demonstrate compliance in accordance with 40 CFR 60.675(d).

The testing conducted on July 9 was a retest of testing performed on May 31, 2002, during which visible emission were observed due to interior cleaning. The July 9th testing was performed while the plant was at full (all pans operating) and normal production. No visible emissions were observed during the July 9th testing. This testing fulfills the requirements contained in NSPS OOO and Permit No. 83-00.

Testing conducted July 16th was performed under normal production volumes but with all three scrubbers in Building 5 shut down. This test was performed to demonstrate that the screening, grading and bagging operations contained in Building 5 can operate with zero visible emissions in compliance with NSPS OOO, with no scrubbers operating. This allows for operations to continue in the event of a scrubber malfunction in accordance with limitations contained in Permit 83-00. No visible emissions were observed during the July 16th testing.

Please contact me with any questions or comments.

Sincerely,

Daniel Taylor
Environmental Manager

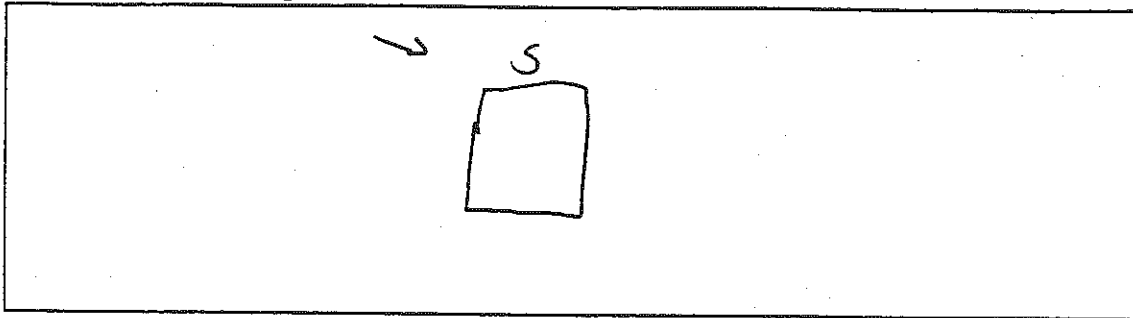
cc: Gene Chauffe
Don Chutas
Jim Crawford

ATTACHMENTS

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Caegll</u> Location <u>St-Clair</u> Company Rep. <u>Dan Taylor</u>	Observer <u>Chris Etheridge</u> <u>Jim Voss</u> Affiliation <u>NDEQ</u> Date <u>7-9-02</u>
Sky Conditions <u>Mostly Sunny</u> Precipitation <u>—</u>	Wind Direction Wind Speed
Industry <u>Salt</u>	Process Unit <u>Build 3 Side</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

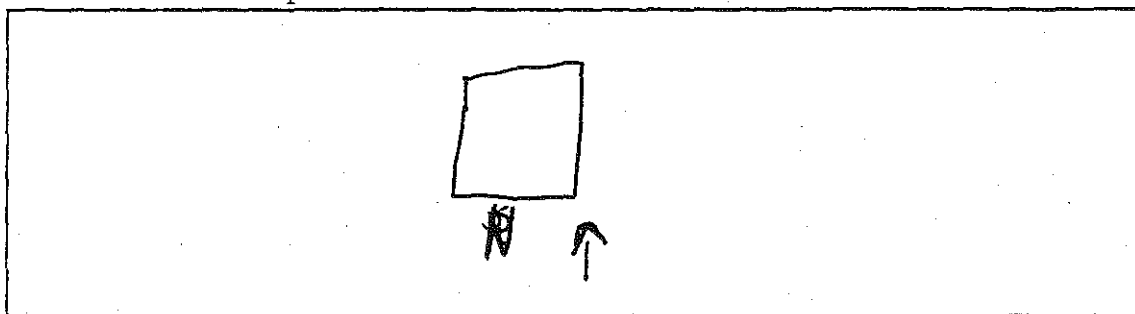
	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>3:06</u>	<u>0</u>	<u> </u>
	<u> </u>	<u> </u>	<u> </u>
	<u> </u>	<u> </u>	<u> </u>
	<u> </u>	<u> </u>	<u> </u>
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	<u> </u>	<u> </u>	<u> </u>
	<u> </u>	<u> </u>	<u> </u>
End Observation	<u>3:21</u>	<u>15 0 min</u>	<u>0</u>

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Cargill</u>	Observer <u>Jim Voss</u> Chris E. Taylor
Location <u>St. Clair</u>	Affiliation <u>MDEQ</u>
Company Rep. <u>Dan Taylor</u>	Date <u>7/9</u>
Sky Conditions <u>Mostly Sunny</u>	Wind Direction <u>S</u>
Precipitation <u>-</u>	Wind Speed <u>15</u>
Industry <u>Salt</u>	Process Unit <u>Build 5</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

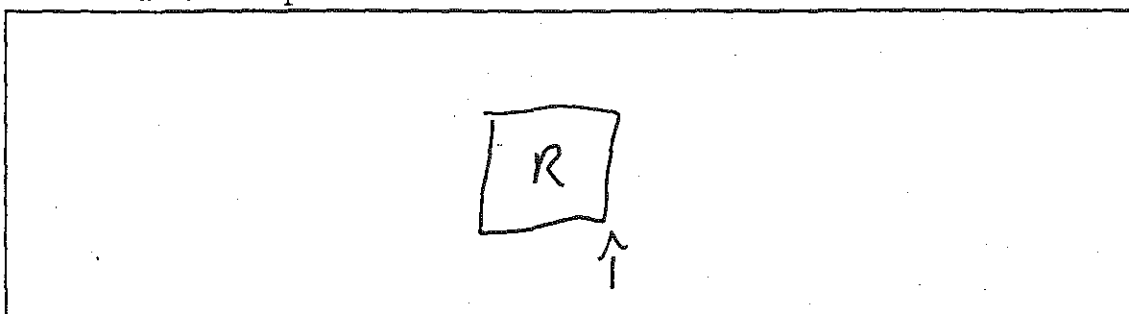
	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>2:44</u>	<u>0</u>	<u>0</u>
End Observation	<u>2:59</u>	<u>15 min</u>	<u>0</u>

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Cargill</u>	Observer <u>Chris E. Hodge</u>
Location <u>St. Clair - South Side</u>	Affiliation <u>MDER</u>
Company Rep. <u>Dan Taylor</u>	Date <u>7/9/02</u>
Sky Conditions <u>Mostly Sunny</u>	Wind Direction <u>S</u>
Precipitation <u>-</u>	Wind Speed <u>15</u>
Industry <u>Salt</u>	Process Unit <u>Boiler 5 Room</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



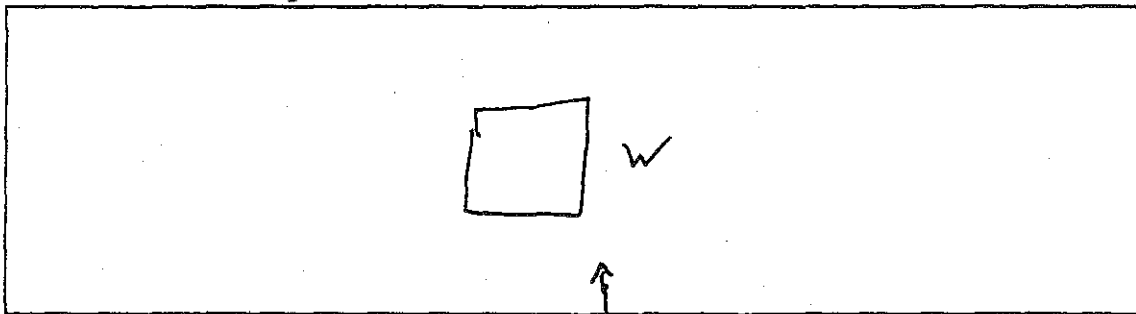
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>2:44</u>		
End Observation	<u>2:59</u>	<u>15 min</u>	<u>Ø</u>

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Cargill</u> Location <u>Build 5, West Side</u> Company Rep. <u>Don Taylor</u>	Observer ^{Don Voss} <u>Chris Etheridge</u> Affiliation _____ Date <u>7/9/02</u>
Sky Conditions <u>Partly Cloudy</u> Precipitation <u>-</u>	Wind Direction <u>S</u> Wind Speed <u>15 mph</u>
Industry <u>Salt</u>	Process Unit <u>Build 5 W.</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

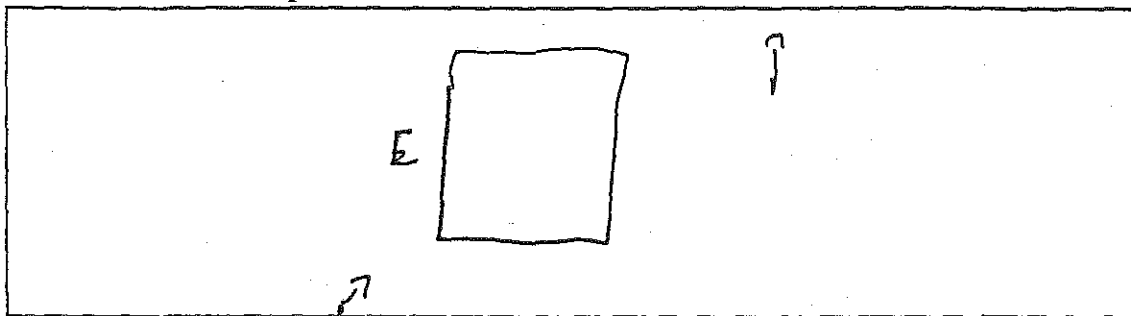
	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>2:27</u>		
End Observation	<u>2:38</u>	<u>15 min</u>	<u>Ø</u>

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Cargill Salt</u>	Observer
Location <u>St. Clair</u>	Affiliation
Company Rep. <u>Don Taylor</u>	Date <u>7/9/02</u>
Sky Conditions <u>Overcast</u>	Wind Direction <u>N</u>
Precipitation <u>none</u>	Wind Speed <u>15 mph</u>
Industry <u>Salt</u>	Process Unit <u>Bu. 113</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



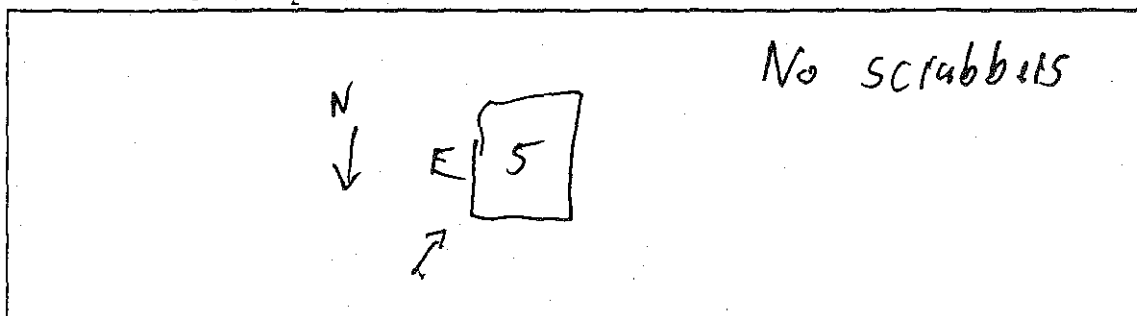
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>1:55</u>		
End Observation	<u>2:10</u>	<u>15 min</u>	<u>0</u>

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Calsill</u> Location <u>St. Clair</u> Company Rep. <u>Dan Taylor</u>	Observer <u>Chris Etheridge</u> Affiliation <u>MOER</u> Date <u>7-16-02</u>
Sky Conditions <u>Clear</u> Precipitation <u>—</u>	Wind Direction <u>W</u> Wind Speed <u>5-10 mph</u>
Industry <u>Salt</u>	Process Unit <u>BIL 5</u> <u>E. S. 7</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



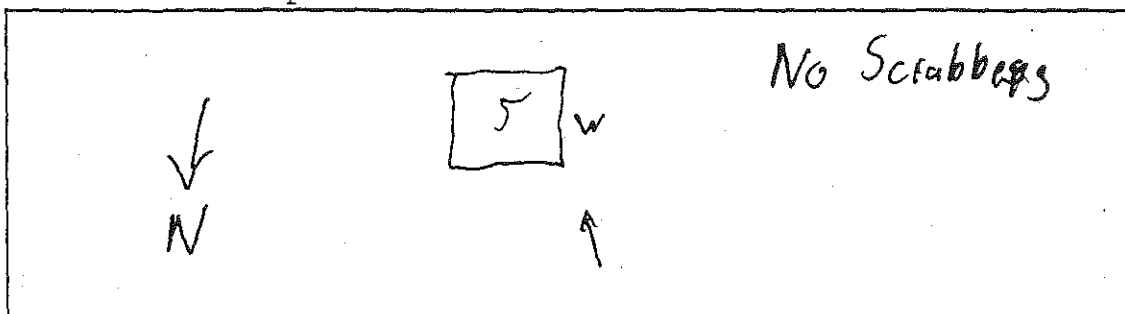
OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>11:21</u>	<u>15 min</u>	<u>05</u>
End Observation	<u>11:39</u>	<u>15 min</u>	<u>05</u>

Figure 22-1

FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

Company <u>Cargill</u>	Observer <u>Chris Edwards</u>
Location	Affiliation <u>MAEQ</u>
Company Rep. <u>Dan Taylor</u>	Date <u>7-16-02</u>
Sky Conditions <u>Clear - slightly hazy</u>	Wind Direction <u>W</u>
Precipitation <u>none</u>	Wind Speed <u>5 mph</u>
Industry <u>Salt</u>	Process Unit <u>8125 West S.I.</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

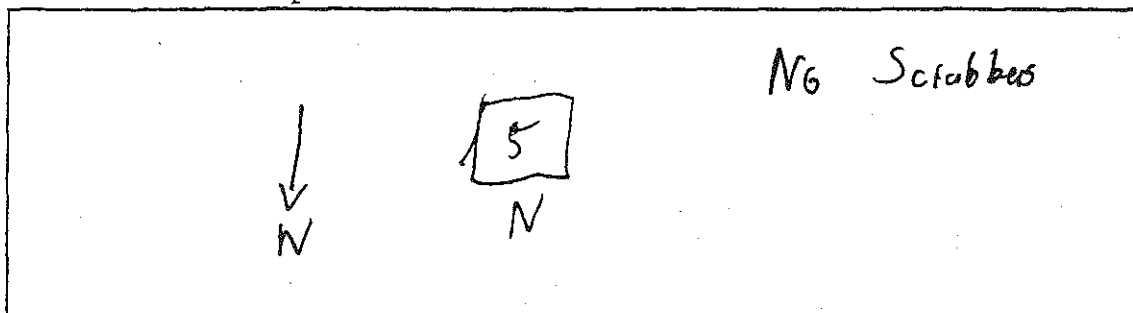
	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>10:03</u>	<u>15</u>	<u>0</u>
End Observation	<u>10:18</u>	<u>15 min</u>	<u>0.5 sec</u>

Figure 22-1

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION**

Company <u>Cargill</u> Location <u>St. Clair</u> Company Rep. <u>Dan Taylor</u>	Observer <u>Chris E. Ellis</u> Affiliation <u>MOE/Q</u> Date <u>7/16/07</u>
Sky Conditions <u>Clear</u> - Precipitation <u>none</u>	Wind Direction <u>W</u> Wind Speed <u>5 mph</u>
Industry <u>Salt</u>	Process Unit ^{Bld 3} <u>N. Side</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS

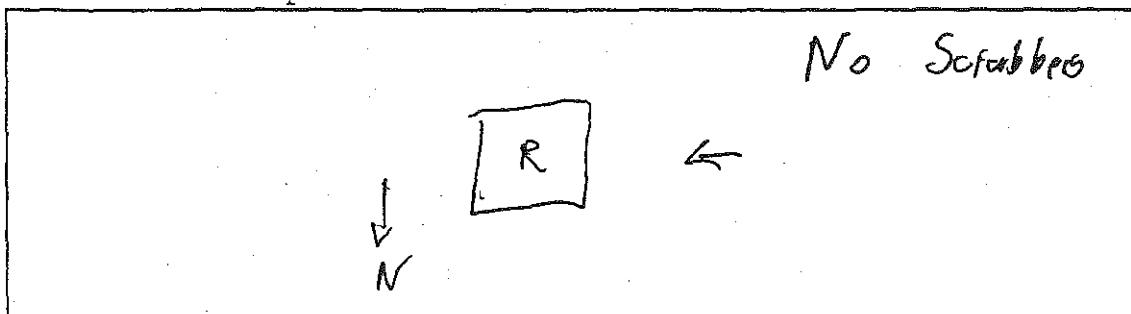
	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>10:19</u>	<u>15 min</u>	<u>0 s</u>
End Observation	<u>10:35</u>	<u>15 m</u>	<u>0 s</u>

Figure 22-1

**FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION**

Company <u>Cargill</u> Location <u>81st Clair</u> Company Rep. <u>Dan Taylor</u>	Observer <u>Chris Etridge</u> Affiliation <u>MOE</u> Date <u>7-16-07</u>
Sky Conditions <u>Clear</u> Precipitation <u>-</u>	Wind Direction <u>W</u> Wind Speed <u>5</u>
Industry <u>Salt</u>	Process Unit <u>8125</u> <u>100V</u>

Sketch process unit: indicate observer position relative to source; indicate potential emission points and/or actual emission points.



OBSERVATIONS	Clock Time	Observation period duration, min:sec	Accumulated emission time, min:sec
Begin Observation	<u>10:21</u>	<u>15 min</u>	<u>0</u>
End Observation	<u>10:56</u>	<u>15 min</u>	<u>0 sec</u>

Figure 22-1



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AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

January 19, 2005

Ms. Teresa Seidel
District Supervisor
MDEQ Air Quality Division
SE Michigan District Headquarters
38980 West Seven Mile Road
Livonia, MI 48152-1006

Re: Written Report for January 10, 2004 Malfunction of Boiler 5

Dear Ms. Seidel,

This report is a written follow-up to the verbal notification Don Chutas made to James Voss, Environmental Quality Analyst, around 1:45 PM on 1/10/05, and the follow-up call on 1/11/05 around 1:30 PM. Michigan Department of Environmental Quality, Air Quality Division, Air Pollution Control Rule 336.1912 requires owner or operator of a source, process, or process equipment to provide notice and written report of an abnormal condition, start-up, shutdown, or a malfunction that results in emissions of any air contaminant continuing for more than 2 hours in excess of a standard or limitation established by any applicable requirement.

On January 10, 2005, Cargill Salt, St. Clair, MI, experienced opacity greater than 20% in excess of 2 hours. This was related to a coal quality and condition. This was the first day that 2 x 0 coal from a different supplier rather than traditional stoker coal from our previous supplier was used as feedstock for #5 coal boiler. On January 5th through 9th, a 50/50 blend of stoker coal and 2 x 0 coal was successfully burned in #5 boiler.

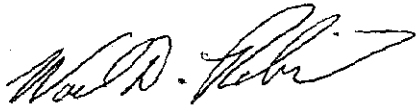
The use of 2 x 0 stoker coal became necessary because of the unavailability of traditional stoker coal prior to the St. Clair River shipping lane being closed. The eastern Kentucky mine that was providing coal to the Cargill, St. Clair plant for over a decade filed for chapter 11 and discontinued stoker coal production. This has required St. Clair to seek other coal sources. The 2 x 0 has a different sizing specification with significantly more fines. The combination of new coal, and adverse weather conditions (wet and frozen coal, and cold external temperatures) caused the spreader stokers on the boiler to inadequately distribute the coal on the traveling grate. This resulted in opacity levels greater than 20% continuously from 12:47 PM to 3:23 PM.

Enclosed are the 6-minute averages collected from 1/9/05 through 1/11/05 as requested by James Voss. The 2 x 0 coal that was in the bunker was consumed and the next delivery on 1/13/05 was

back to the 50/50 blend of 2 x 0 and traditional stoker coal. St. Clair has a limited quantity of the stoker coal. We are currently investigating the best way to operate with our current coal supply situation. One of the options we are pursuing is working with our supplier to screen some of the fines out of the 2 x 0 coal prior to shipping to the plant. We will evaluate the effectiveness once this trial period has been completed.

If you have any questions please call me at 810-326-2841.

Sincerely,



Wade D. Richards
Powerhouse Superintendent

Cc: Don Chutas
EHS File
James Voss, MDEQ, Air Quality Division

Enclosures:

Boiler #5 Opacity Non Compliance report 1/9/05 through 1/11/05

**Boiler #5 Opacity Non Compliance Report**

Salt Division - St. Clair, MI

Report Date: 01/09/05

NON-COMPLIANT OPACITY EXCURSIONS

<i>Date / Time</i>	<i>Boil5_Opacity</i>	<i>Comment</i>
12:47 AM	22.4	Soot blowing
01:48 AM	21.8	Soot blowing
02:47 AM	20.5	Soot blowing
07:47 AM	22.5	Soot blowing
08:47 AM	25.1	Soot blowing
09:47 AM	23.5	Soot blowing
05:59 PM	20.7	Soot blowing

CALIBRATION DATA

<i>Calibration Type</i>	<i>Collection Time</i>	<i>Calibration Data</i>
Zero:	7:01:27 AM	0.0
Window:	7:02:57 AM	0.0
Spart:	7:04:27 AM	45.0
Stack Factor:	7:05:43 AM	25.8

**Boiler #5 Opacity Non Compliance Report**

Salt Division - St. Clair, MI

Report Date: 01/10/05

NON-COMPLIANT OPACITY EXCURSIONS

<i>Date / Time</i>	<i>Boil5_Opacity</i>	<i>Comment</i>
05:47 AM	24.0	Soot blowing
06:47 AM	24.4	Soot blowing
09:47 AM	23.3	Soot blowing
10:29 AM	21.7	2 X 0 coal
10:41 AM	21.8	2 X 0 coal
12:05 PM	20.8	2 X 0 coal
12:35 PM	21.1	2 X 0 coal
12:47 PM	20.8	2 X 0 coal
12:53 PM	20.9	2 X 0 coal
12:59 PM	21.9	2 X 0 coal
01:05 PM	23.2	2 X 0 coal
01:11 PM	26.6	2 X 0 coal
01:17 PM	24.9	2 X 0 coal
01:23 PM	23.3	2 X 0 coal
01:29 PM	22.6	2 X 0 coal
01:35 PM	24.0	2 X 0 coal
01:41 PM	23.3	2 X 0 coal
01:47 PM	25.1	2 X 0 coal
01:53 PM	29.8	2 X 0 coal
01:59 PM	30.3	2 X 0 coal
02:05 PM	26.0	2 X 0 coal
02:11 PM	25.3	2 X 0 coal
02:17 PM	24.7	2 X 0 coal
02:23 PM	23.9	2 X 0 coal

NON-COMPLIANT OPACITY EXCURSIONS

Date / Time	Boil5_Opacity	Comment
2:29 PM	23.2	2 X 0 coal
2:35 PM	26.2	2 X 0 coal
2:41 PM	23.4	2 X 0 coal
2:47 PM	24.6	2 X 0 coal
2:53 PM	23.7	2 X 0 coal
2:59 PM	22.3	2 X 0 coal
3:05 PM	22.3	2 X 0 coal
3:11 PM	20.8	2 X 0 coal
3:17 PM	22.2	2 X 0 coal
3:23 PM	20.8	2 X 0 coal
3:41 PM	28.2	2 X 0 coal
3:47 PM	23.7	2 X 0 coal
4:17 PM	20.9	2 X 0 coal
4:23 PM	27.5	2 X 0 coal
5:47 PM	24.5	Soot blowing
6:17 PM	21.7	2 x 0 coal
6:23 PM	26.4	2 X 0 coal
6:47 PM	27.1	2 X 0 coal
7:13 PM	31.6	2 X 0 coal
7:19 PM	24.8	2 X 0 coal
7:51 PM	26.1	2 X 0 coal
8:11 PM	23.6	2 X 0 coal
8:31 PM	26.2	2 X 0 coal
8:51 PM	28.5	2 X 0 coal
9:11 PM	21.0	2 X 0 coal
9:31 PM	23.1	2 X 0 coal
9:51 PM	32.1	2 X 0 coal

NON-COMPLIANT OPACITY EXCURSIONS

<i>Date / Time</i>	<i>Boil5_Opacity</i>	<i>Comment</i>
08:17 PM	23.5	2 X 0 coal
08:23 PM	25.8	2 X 0 coal
08:29 PM	21.3	2 X 0 coal
08:35 PM	22.3	2 X 0 coal
08:59 PM	33.7	2 X 0 coal
09:05 PM	23.5	2 X 0 coal
09:35 PM	22.8	2 X 0 coal
10:17 PM	24.9	2 X 0 coal
10:53 PM	22.4	2 X 0 coal
10:59 PM	26.4	2 X 0 coal
11:29 PM	24.6	2 X 0 coal

CALIBRATION DATA

<i>Calibration Type</i>	<i>Collection Time</i>	<i>Calibration Data</i>
Zero:	7:01:29 AM	0.0
Window:	7:02:59 AM	0.0
Span:	7:04:29 AM	45.0
Stack Factor:	7:05:45 AM	25.8

**Boiler #5 Opacity Non Compliance Report**

Salt Division - St. Clair, MI

Report Date: 01/11/05

NON-COMPLIANT OPACITY EXCURSIONS

<i>Date / Time</i>	<i>Boil5_Opacity</i>	<i>Comment</i>
03:05 AM	20.9	2 X 0 coal
09:17 AM	20.6	Soot blowing
05:23 PM	22.3	Soot blowing
06:53 PM	22.1	Soot blowing
07:47 PM	21.8	Soot blowing
08:47 PM	23.1	Soot blowing

CALIBRATION DATA

<i>Calibration Type</i>	<i>Collection Time</i>	<i>Calibration Data</i>
Zero:	7:01:28 AM	0.0
Window:	7:02:58 AM	0.0
Span:	7:04:28 AM	45.0
Stack Factor:	7:05:44 AM	25.8